



State of New Jersey

Chris Christie
Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Paula T. Dow
Attorney General

Kim Guadagno
Lt. Governor

David Rebuck
*Acting
Director*

December 12, 2011

Michael A. Magazzu, Esq.
Corporate Counsel
Caesars Entertainment, Eastern Division
c/o Bally's Atlantic City
Park Place and the Boardwalk
Atlantic City, NJ 08401

Dear Mr. Magazzu:

The staff of the Division of Gaming Enforcement's Regulatory Enforcement Bureau has reviewed Showboat Atlantic City Operating Company, LLC ("Showboat") Petition #3411103 filed on December 7, 2011. Showboat is seeking approval for amendments to its Certificate of Operation and CHAB license to reconfigure certain table games and slot zones on the casino floor.

Showboat is currently operating under a Certificate of Operation, which was approved in Petition #2201103 on August 10, 2011, by the Division of Gaming Enforcement.

By Petition #3411103, Showboat seeks approval to complete modifications to its casino floor and simulcast room, as depicted on the architectural drawings labeled PCO-78, dated October 27, 2011, project # 1101.16, (Exhibit A) certified by Michael Demling, License #08676(Exhibit D).



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The petitioner proposes the following:

1. Remove and replace table games in Pit 1 in the Simulcast Area.
2. Remove and replace table games in Pit 2 in the Simulcast Area.
3. Remove and replace table games in Pit 3 in the Simulcast Area.
4. Remove and replace table games in Pit 4 on the Casino Floor.
5. Remove and replace table games in Pit 7 in the Simulcast Area.
6. Remove and install slot machines in Slot Bank GH.
7. Remove and renumber slot machines in Slot Banks LB and LC
8. Remove and install slot machines in Slot Banks QF and QI.
9. Install one Jumbo slot machine in Slot Zone V.

Pit Areas, Casino Floor

Pit #4

Remove: One (1) Blackjack table, (BJ-409);
Add: One (1) Three Card Poker table, (TC409).
Remove: One (1) Blackjack table, (BJ411);
Add: One (1) Craps table, (CR411).
Remove: One (1) Blackjack table, (BJ412);
Remove: One (1) Three Card Poker table, (TC414);
Add: One (1) Blackjack table, (BJ414).
Add: Four (4) Blackjack tables, (BJ416, BJ417, BJ418 and BJ419)

Net increase of three (3) gaming tables in Pit 4

Pit Areas, Simulcast Room

Pit#1

Remove: One (1) Pai Gow table, (PG102);
Add: One (1) Mini Baccarat table, (MB102).
Remove: One (1) Pai Gow Tile table, (PT104);
Add: One (1) Mini Baccarat table, (MB104).
Remove: One (1) Pai Gow Poker table, (PG106);
Add: One (1) Mini Baccarat table, (MB106).
Remove: One (1) Mini Baccarat table, (MB110);
Add: One (1) Pai Gow Poker table, (PG110).
Remove: One (1) Mini Baccarat table, (MB113);
Add: One (1) Pai Gow Tile table, (PT113).
Add: One (1) Pai Gow Poker table, (PG124)

Net increase of one (1) table game in Pit 1

Pit#2

Remove: One (1) Blackjack table, (BJ210);
Add: One (1) Double Attack Blackjack table, (DA210).
No change in table game units in Pit 2.

Pit#3

Remove: One (1) Spanish 21 table, (SP301);
Add: One (1) Three Card Poker table, (TC301).
Remove: One (1) Four Card Poker table, (FC303);
Add: One (1) Three Card Poker table, (TC303).
Remove: One (1) Three Card Poker table, (TC307);
Add: One (1) Four Card Poker table, (FC307).
Remove: One (1) Three Card Poker table, (TC308);
Add: One (1) Blackjack table, (BJ308).
Remove: One (1) Blackjack table, (BJ309);
Add: One (1) Three Card Poker table, (TC309).
Remove: One (1) Four Card Poker table, (FC310);
Add: One (1) Three Card Poker table, (TC310).
Remove: One (1) Double Attack Blackjack table, (DA316);
Add: One (1) Three Card Poker table, (TC316).
No change in table game units in Pit 3.

Pit#7

Remove: One (1) Blackjack table, (BJ701);
Add: One (1) Roulette table and wheel, (RO701).
Remove: One (1) Blackjack table, (BJ704);
Add: One (1) Spanish 21 table, (SP704).
Remove: One (1) Roulette table and wheel, (RO716)
Add: One (1) Blackjack table, (BJ716).
No change in table game units in Pit 7.

Slot Areas

Slot Zone G

Remove: Eight (8) slant top slot machines from Slot Bank GH (GH01 - GH08);
Install: Eight (8) upright slot machines at Slot Bank GH (GH01-GH08)

No Change in slot machine count.

Slot Zone L

Remove: Two (2) slot machines from Slot Bank LB;
Renumber: Slot Bank LB01 through LB08.
Remove: Two (2) slot machines from Slot Bank LC;
Renumber: Slot Bank LC01 through LC08.

Decrease of four (4) slot machines.

Slot Zone Q

Remove: Six (6) upright slot machines from Slot Bank QF;
Install: Four (4) slant top slot machines at Slot Bank QF01-QF04
Remove: Six (6) upright slot machines from Slot Bank QI;
Install: Four (4) slant top slot machines at Slot Bank QI01-QI04.

Decrease of four (4) slot machines.

Slot Zone V

Install: One (1) Jumbo slot machine at new Slot Bank VR01.
Increase of one (1) slot machine.

The summary of the statistical calculations is as follows:

1. A decrease of seven (7) slots machines. The total number of slot machines will be **2,599**.
2. An increase of four (4) tables games. The new total is **112** table games (Casino floor will have forty-three (**43**) games and the Simulcast Room will have sixty-nine (**69**) games).
3. The total gaming area is unchanged at 139,540 sq. ft. (122,454 sq. ft. casino area and 17,086 sq. ft. simulcast area).
4. The allowable slot coverage (90% of 139,540 sq. ft.) is 125,586 sq. ft.
5. The actual slot coverage is 87,687 sq. ft., which is 63.00% of the total gaming area and within the allowable 90% for slot density.

Based on the Division's authority the requested amendments to Showboat's Certificate of Operation and CHAB license as set forth above, are hereby granted pursuant to N.J.S.A. 5:12-83 and 5:12-103. This approval authorizes a casino room containing and consisting of:

Showboat's Casino Floor

- One hundred twenty-two thousand, four hundred and fifty-four (122,454) square feet;
- Two thousand five hundred ninety-nine (2,599) slot machines and two thousand five hundred ninety-nine (2,599) slot stools; and
- The following permanent table game configuration consisting of:
 - Sixteen (16) Blackjack tables;
 - Two (2) Roulette tables and wheels;
 - One (1) Craps table; and
 - Twenty-four (24) Poker tables.

Showboat's Simulcast Floor

- Seventeen thousand and eighty-six (17,086) square feet;
- Four (4) Pari-mutual machines
- Three (3) Self-service pari-mutual machines; and
- The following permanent table game configuration consisting of:
 - Twenty-five (25) Blackjack tables;
 - Four (4) Craps tables;
 - Six (6) Roulette tables and wheels;
 - One (1) Rapid Roulette table and wheel;
 - Three (3) Pai Gow Poker tables;
 - Two (2) Pai Gow Tiles tables;
 - Nine (9) Mini Baccarat tables;
 - One (1) Caribbean Stud Poker table;
 - One (1) Big Six table and wheel;
 - Two (2) Let It Ride Poker tables;
 - Two (2) Spanish 21 tables;
 - Nine (9) Three Card Poker tables;
 - One (1) Four Card Poker table;
 - One (1) Ultimate Texas Hold'em Poker table;
 - One (1) Double Attack Blackjack table; and
 - One (1) Flop Poker table.

Combined total of one hundred twelve (112) table games.

Petitioner has also presented a new Alternate Pit Plan for Pit1AB & 1BB (PCO-78) pursuant to N.J.A.C. 13:69C 7.3(b)2 which consists of:

Eight (8) Mini Baccarat tables;
Two(2) Pai Gow Tiles tables; and
Three (3) Pai Gow Poker tables.

When Showboat uses this alternate plan, the total number of table games will be reduced by one (1) for a total of **111 table games**

Please note that although the Petitioner does not propose any changes to smoking areas, the designation of smoking areas in casinos is subject to the jurisdiction of the NJ Department of Health and Senior Services and the Atlantic City Department of Health and Human Services, not the Division. Accordingly, this letter should in no way be construed as approving areas of the gaming floor for smoking.

This approval is subject to the following conditions:

A. Revised operational blueprints, reflecting the changes approved herein and inclusive of any deficiencies noted, shall be submitted to the Division's Regulatory Enforcement Bureau, casino licensee's security podium and the casino licensee's CCTV monitoring room;

B. All gaming chips be transported to and from the gaming tables in accordance with N.J.A.C. 13:69D-1.22 and 1.23;

C. A revised Table Game, Roulette Wheel and Big Six Wheel inventory lists be submitted to the Division;

D. All steps necessary and appropriate to ensure maximum patron comfort and safety during the period of renovation be taken;

E. The procedures detailed in the Slot Procedures Manual be followed during the movement of slot machines;

F. A revised Slot Master List be submitted to the Division;

G. Showboat notifies the Division immediately in the event of any modification to the approvals granted herein;

H. Showboat comply with all requirements and conditions appended to approvals received from all involved agencies of government whose approvals are required in order for a Certificate of Occupancy for the general public to be issued including, but not limited to, the Department of Community Affairs and the local construction official;

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I. Any new camera locations which have been installed to the CCTV system be depicted on the revised blueprint; and

J. Once modifications have been completed, a satisfactory inspection and approval by the Division is required of the gaming areas by way of a CCTV review **prior to the proposed areas being used for gaming activity**. To schedule the inspection, please contact our office at 441-7529.

If you have any questions, please do not hesitate to contact me at 441-7557.

Sincerely,



Don Errera, Deputy Chief
Regulatory Enforcement Bureau

BEL/

cc: DGE Intake
O-33-11-128

Slot Statistics Petition 3411103 (PCO-78)

<i>Slot Zone</i>	<i>PCO-77 Slots Approved</i>	<i>PCO-77 Stools Approved</i>	<i>PCO-78 Slots Proposed</i>	<i>PCO-78 Stools Proposed</i>	<i>Net Change Slots/Stools</i>	
A	147	147	147	147	0	0
B	62	62	62	62	0	0
C	125	125	125	125	0	0
D	79	79	79	79	0	0
E	109	109	109	109	0	0
F	127	127	127	127	0	0
G	63	63	63	63	0	0
H	204	204	204	204	0	0
I	49	49	49	49	0	0
J	136	136	136	136	0	0
K	172	172	172	172	0	0
L	192	192	188	188	-4	-4
M	130	130	130	130	0	0
O	50	50	50	50	0	0
P	66	66	66	66	0	0
Q	147	147	143	143	-4	-4
R	94	94	94	94	0	0
S	48	48	48	48	0	0
V	150	150	151	151	1	1
W	141	141	141	141	0	0
Y	109	109	109	109	0	0
TOTALS	2,606	2,606	2,599	2,599	-7	-7

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